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September 6, 2006

Mr. Adam Wilding Parrish  
110 South Cumberland  
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**RE: *Glaeser v. Cheatham Co. Sherriff's Department, et al.***  
***U.S. District Court #3-05-1043***

Dear Adam,

Please find enclosed the Defendants' Offer of Judgment in the above-referenced matter. Please consider this service of a Rule 68 Offer of Judgment pursuant to Rule 68 of the Federal Rules of Civil Procedure. If your client wishes to accept this offer, you will need to notify me within 10 days after service. If I do not hear from you, then I believe Rule 68 treats silence as a rejection. In the event the Defendants succeed in this case, we will proceed to collect all allowable costs and fees, and we will pursue attorneys fees allowed to the prevailing party under the Civil Rights Act.

I also wanted to acknowledge receipt of your written discovery. I will endeavor to answer it in a timely fashion.

Please advise me when your client will be available for his deposition. I am very open and very flexible in the month of September. If I do not hear from you within the next week, I will issue a notice for the plaintiff's deposition.

Furthermore, I would like to hear from you whether you intend to supplement the plaintiff's initial Rule 26(a)(1) disclosures. I do not recall ever receiving any further information from you – i.e. the medical records and bills and any other documents supporting the Plaintiff's claims. Rule 26(a)(1)(B) & (C) require the Plaintiff provide copies of these documents as well as a calculation of damages. If you do not intend to produce this information, then please advise me immediately so that I can file a motion to compel.

EXHIBIT

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